

**UNITED STATES BANKRUPTCY COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	BANKRUPTCY CASE NO.
	§	
SANJAC SECURITY, INC.	§	15-31008-H4-11
	§	
DEBTOR	§	Chapter 11

EMERGENCY MOTION FOR AUTHORITY TO USE CASH COLLATERAL

IF YOU WANT A HEARING, YOU MUST REQUEST ONE IN WRITING, AND YOU MUST RESPOND SPECIFICALLY TO EACH PARAGRAPH OF THIS PLEADING. YOU MUST FILE YOUR RESPONSE WITH THE CLERK OF THE BANKRUPTCY COURT WITHIN TWENTY ONE DAYS FROM THE DATE YOU WERE SERVED AND GIVE A COPY TO THE PERSON WHO SENT YOU THE NOTICE; OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF.

IF A PARTY REQUESTS EMERGENCY CONSIDERATION, THE COURT MAY ACT EXPEDITIOUSLY ON THE MATTER. IF THE COURT ALLOWS A SHORTER RESPONSE TIME THAN TWENTY ONE DAYS, YOU MUST RESPOND WITHIN THAT TIME. IF THE COURT SETS AN EMERGENCY HEARING BEFORE THE RESPONSE TIME WILL EXPIRE, ONLY ATTENDANCE AT THE HEARING IS NECESSARY TO PRESERVE YOUR RIGHTS. IF AN EMERGENCY HEARING IS NOT SET, YOU MUST RESPOND BEFORE THE RESPONSE TIME EXPIRES.

EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE THAT THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

COMES NOW SANJAC SECURITY, INC., Debtor, and files this it's Emergency Motion for Authority to Use Cash Collateral, and in support thereof would respectfully state as follows:

1. Movant is the Debtor and Debtor in Possession herein.
2. Debtor is a security company providing security guard and patrol services.
3. The Internal Revenue Service asserts a security interest in all of Debtor's accounts receivable by virtue of UCC filings to secure indebtedness owed by Debtor.

4. Debtor needs to continue its business herein in order to be able to propose a plan of reorganization.

5. Debtor has no alternative borrowing source and to remain in business must be permitted to use its funds collected from normal business operations to pay its pay payroll, rent, advertising, permits, repairs and maintenance, insurance, utilities, office expenses and supplies.

6. This motion is an emergency motion under Bankruptcy Rule 4001(b)(2). Pending a final hearing on the relief requested by this motion, the Debtor needs to use the cash collateral to avoid immediate and irreparable harm to the estate in that absent such use the Debtor would be required to cease operations.

7. The cash collateral at issue herein is the accounts receivable. Debtor is requesting authorization for use of cash collateral for 14 days in the amount of \$106,000.00. Obviously, Debtor consents to giving the Internal Revenue Service a replacement lien on all of its security.

WHEREFORE, premises considered, Debtor respectfully moves this Honorable Court to authorize its use of cash collateral on an emergency basis and at a final hearing, and for such other and further relief as is just.

Respectfully submitted,

/s/ Margaret M. McClure
MARGARET M. MCCLURE
State Bar No. 00787997
2 Houston Center
909 Fannin, Suite 3810
Houston, Texas 77010
(713) 659-1333
(713) 658-0334 (fax)
Margaret@mmmccclurelaw.com (e-mail)

ATTORNEY FOR DEBTOR

**SANJAC SECURITY INC
14 DAY BUDGET**

REVENUE (SALES)	\$122,661.13
TOTAL REVENUE	\$122,661.13
COST OF SALES	
FUEL	\$4200.00
TOTAL COST OF SALES	\$4200.00
GROSS PROFIT	\$118,461.13
EXPENSES	
SALARY/PAYROLL EXPENSE	\$68,000.00
PAYROLL TAXES	\$18,000.00
SUPPLIES (OFFICE & OPERATING)	\$500.00
REPAIRS & MAINTENANCE	\$2245.20
ADVERTISING	
ACCOUNTING & LEGAL	
RENT	\$1500.00
TELEPHONE/COMMUNICATIONS	\$3667.83
UTILITIES	
INSURANCE (GL, AUTO, & UMBRELLA)	
INSURANCE (WORK COMP)	\$3800.00
PERMITS (TX DEPT PUBLIC SAFETY)	\$750.00
OTHER EXPENSES (UNIFORMS)	\$1000.00
MISC.	\$2000.00
TOTAL EXPENSES	\$101,463.03
NET PROFIT	\$16,998.10
TOTAL EXPENSES INCLUDING TOTAL COST OF SALES	\$105,663.03

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion was served on all parties in interest as set out on the attached matrix either electronically or by U.S. mail on February 24, 2015.

/s/ Margaret M. McClure
MARGARET M. MCCLURE

Label Matrix for local noticing
0541-4
Case 15-31008
Southern District of Texas
Houston
Tue Feb 24 14:13:56 CST 2015

Sanjac Security, Inc.
P.O. Box 654
Humble, TX 77347-0654

United States Bankruptcy Court
PO Box 61010
Houston, TX 77208-1010

A-1 Golf Cars/
James A. Storms
609 Oak Street
La Marque, TX 77568-5948

AT&T
P.O. Box 105068
Atlanta, GA 30348-5068

Amsys Innovative Solutions
8300 Bissonnett Street, Suite 570
Houston, TX 77074-3915

Aramark
1665 Towhurst, Suite 160
Houston, TX 77043-3236

Carr, Riggs & Ingram, LLC
Two Riverway, 15th Floor
Houston, TX 77056-2084

Digitec
12560 Reed Road, Suite 200
Sugar Lan, TX 77478-3380

Harris County, et al
c/o Mr. John P. Dillman
Linebarger Goggan Blair & Sampson
P.O. Box 3064
Houston, TX 77253-3064

Harris County, et al
c/o Tax Assessor-Collector
P.O. Box 4089
Houston, TX 77210-4089

Harris County, et al
c/o Tax Assessor-Collector
P.O. Box 4622
Houston, TX 77210-4622

Harris Leasing Company
3100 S. Gessner, Suite 108
Houston, TX 77063-3744

Harris Leasing Company
P.O. Box 42203
Houston, TX 77242-2203

Humble ISD
c/o Mr. Owen M. Sonik
Perdue, Brandon, Fielder, Collins & Mott
1235 North Loop West, Suite 600
Houston, TX 77008-1772

In-Time Solutions, Inc.
#1410-1188 W. Georgia Street
Vancouver, BC
Canada V6E 4A2

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

(p)INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

Internal Revenue Service
c/o United States Attorney
Southern District of Texas
1000 Louisiana Street, Suite 2300
Houston, TX 77002-5010

Planche-Politz-Ledit, LLC
18212 East Petroleum Drive, Suite 1B
Baton Rouge, LA 70809-6134

Scotts Janitorial Service
P.O. Box 4006
Humble, TX 77347-4006

Texas Comptroller of Public Accounts
111 E. 17th Street
Austin, TX 78774-0100

Texas Comptroller of Public Accounts
c/o Office of the Attorney General
P.O. Box 12548
Austin, TX 78711-2548

US Trustee
Office of the US Trustee
515 Rusk Ave
Ste 3516
Houston, TX 77002-2604

Windstream
P.O. Box 600766
Dallas, TX 75360

YP
P.O. Box 5010
Carol Stream, IL 60197-5010

Margaret Maxwell McClure
Attorney at Law
909 Fannin
Suite 3810
Houston, TX 77010-1030

Internal Revenue Service
 Special Procedures Branch
 Insolvency Section II (7, 9, 11, 12)
 1919 Smith Street, Stop 5025HOU
 Houston, TX 77002

(d)Internal Revenue Service
 c/o United States Attorney General
 U.S. Department of Justice
 10th & Constitution, N.W.
 Washington, D.C. 20530

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Sanjac Security, Inc.
 P.O. Box 654
 Humble, TX 77347-0654

End of Label Matrix	
Mailable recipients	26
Bypassed recipients	1
Total	27